

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a  
VERIZON WIRELESS and VERIZON  
CORPORATE SERVICES GROUP, INC.,  
Defendants.

Case No. 2:23-cv-00352-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF KRISTOPHER R. DAVIS IN SUPPORT OF  
PLAINTIFF HEADWATER RESEARCH LLC'S MOTION FOR LEAVE TO  
SUPPLEMENT EXPERT REPORTS BASED ON NEWLY PRODUCED DISCOVERY**

I, Kristopher R. Davis, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ August & Kabat, and counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff's Motion for Leave to Supplement Expert Reports Based on Newly Produced Discovery. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as **Exhibit 1** is a true and correct copy of the Supplemental Expert Report of Dr. Richard D. Wesel, dated March 15, 2025.

3. Attached as **Exhibit 2** is a true and correct copy of the Second Supplemental Report of Dr. Coleman Bazelon, dated March 19, 2025.

4. Attached as **Exhibit 3** is a true and correct copy of excerpts from the Notice of Subpoena to Apple Inc., served on May 21, 2024.

5. Attached as **Exhibit 4** is a true and correct copy of excerpts from the Notice of Subpoena to Samsung Electronics America, Inc., served on May 21, 2024.

6. Attached as **Exhibit 5** is a true and correct copy of the Notice of Subpoena to Motorola Mobility LLC, served on May 21, 2024.

7. Attached as **Exhibit 6** is a true and correct copy of an email string between counsel for Headwater and Motorola, from January-March 2025.

8. Attached as **Exhibit 7** is a true and correct copy of an email string between counsel for Headwater and Apple, from January-March 2025.

9. Attached as **Exhibit 8** is a true and correct copy of excerpts from an email string between counsel for Headwater and Apple, from January-February 2025.

10. Attached as **Exhibit 9** is a true and correct copy of an email string between counsel for Headwater and Samsung, from February 2025.

11. Attached as **Exhibit 10** is a true and correct copy of an email string between counsel for Headwater and Samsung, from January-February 2025.

12. Attached as **Exhibit 11** is a true and correct copy of an email string between counsel for Headwater and Samsung, from February-March 2025.

13. Attached as **Exhibit 12** is a true and correct copy of excerpts from the Deposition Transcript of Dr. Richard Wesel, dated March 17, 2025.

14. Attached as **Exhibit 13** is a true and correct copy of excerpts from the Deposition Transcript of Dr. Coleman Bazelon, dated March 21, 2025.

15. Attached as **Exhibit 14** is a true and correct copy of an email string between counsel for Headwater and Verizon from January-February 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 8, 2025, at Los Angeles, California.

/s/ Kristopher R. Davis  
Kristopher R. Davis